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9		TES DISTRICT COURT ISTRICT OF CALIFORNIA
10		
11	UNITED STATES OF AMERICA,	NO. 15 Cr. 582 WHO
12	Plaintiff,	STIPULATED MOTION AND
	v.	[PROPOSED] ORDER SHORTENING TIME FOR MOTION FOR REVIEW OF DETENTION ORDER
13	ADAM SHAFI,	
14	Defendant	Date: January 14, 2016 Time: 1:30 p.m.
15		
16	PLEASE TAKE NOTICE that on Jar	nuary 14, 2016 at 1:30 p.m., defendant Adam
17	Shafi will move for review of the magistrate	court detention order. [Dkt. 30], which was
18	issued earlier today. The parties have stipula	ated that the motion for review be made on a
19	shortened schedule, with the defense Motion	n for Review of the Detention Order to be
20	filed on or before January 8, 2016, and the g	overnment opposition to be filed on or before
21	January 12, 2016. See L.R. 47-1(a)(3); 47-20	(a). The parties agree that the Stipulated
22	STIPULATED MOTION 1 SHORTENING TIME FOR REVIEW OF DETENTION ORDER CR 15-0582 WHO	

Motion Shortening Time may be granted based on this stipulated motion and the declaration of counsel below, and without oral argument.

Declaration of Counsel

- 1. Along with Joshua L. Dratel, I represent Mr. Adam Shafi in the above-captioned matter and I submit this declaration in support of Mr. Shafi's Stipulated Motion Shortening Time for Motion for Review of Detention Order. I present the following based on information and belief.
- 2. On July 3, 2015, Mr. Shafi was arrested on a Complaint that alleged an attempt to provide material support to a foreign terrorist organization in violation of 18 U.S.C. § 2339B. [Dkt. 1]. The Court ordered the matter sealed, [Dkt. 2], and it remained under seal in its entirety until Mr. Shafi was arraigned on an Indictment December 17, 2015. [Dkt. 18].
- 3. On December 22, 2015, the magistrate court conducted a bail hearing and ordered the Mr. Shafi be detained and set the matter for status conference before this Court on January 14, 2106 at 1:30 p.m. [Dkt. 23]. On January 5, 2016, the magistrate court issued its written order detaining Mr. Shafi. [Dkt. 30]. A transcript of the detention hearing has been prepared. [Dkt. 27].
- 4. Mr. Shafi can file his motion for review of the detention order on or before January 8, 2016, and the government has agreed to file its opposition to the motion on or before January 12, 2016.

1	5. Counsel now seeks an order shortening the time provided in Local Rule 47-
2	2(a) so that the Court can consider the Motion for Review of Detention Order at the status
3	conference scheduled for January 14, 2016 at 1:30 p.m.
4	I declare under the penalty of perjury that the foregoing is true and correct to the
5	best of my knowledge.
6	Executed this 5th day of January, 2016, at Berkeley, California.
7	<u>s/ Erik B. Levin</u> Erik B. Levin
9	SO STIPULATED.
10	DATED: 1/5/16
11	BRIAN STRETCH
12	Acting United States Attorney
13	s/Jeffrey Shih
14	Jeffrey Shih, Esq. Assistant United States Attorney
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16	DUDGUANT TO CTIDUU ATION IT IC CO ODDEDED
17	PURSUANT TO STIPULATION, IT IS SO ORDERED. DATED:
18	DATED.
19	JUDGE WILLIAM H. ORRICK
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21	
22	STIPULATED MOTION 3 SHORTENING TIME FOR REVIEW OF DETENTION ORDER

CR 15-0582 WHO

1	Certificate of Service
2	I hereby certify that on January 5, 2016, I filed the foregoing STIPULATED
3	MOTION AND [PROPOSED] ORDER SHORTENING TIME FOR MOTION
4	FOR REVIEW OF DETENTION ORDER with the Clerk of the United States District
5	Court for the Northern District of California by using the CM/ECF system.
6	I declare under penalty of perjury that the foregoing is true and correct. Executed
7	on January 5, 2016.
8	s/Erik B. Levin
9	Erik B. Levin, Esq.
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22	STIPULATED MOTION 4 SHORTENING TIME FOR REVIEW OF DETENTION ORDER

CR 15-0582 WHO